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January 8, 2020

**BY ECF**

Honorable Sarah L. Cave  
United States Magistrate Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Jermaine Dunham v. City of New York, et al.,  
11 Civ. 1223 (ALC) (SLC)

Your Honor:

I am a Senior Counsel in the New York City Law Department assigned to the defense of the City of New York, Philip Lobello and Lamar Oliver in the above referenced matter. In that capacity I write to respectfully request a one-week adjournment of the January 8, 2020 deadline for the parties to meet and confer and file a joint letter with the Court stating any remaining issues still in dispute. In addition, I also write to respectfully request an adjournment of the January 10, 2020 In-Person Conference to a date convenient to the Court following the filing of the joint letter. Plaintiff's counsel, Maxwell Brown, Esq., consents to these requests. This is defendants' first request to adjourn the filing date of the joint letter and to adjourn the In-person conference.

At the outset, I sincerely apologize for this late request. I received plaintiff's updated discovery demands in the afternoon on Friday, January 3, 2020 and it was the parties' intention to have a meet and confer early this week and file a joint letter in accordance with Your Honor's December 17, 2019 Order. However, I became extremely ill over the weekend and have been home with the flu this entire week. Due to my illness, we have been unable to have our meet and confer and thus, are unable to file a joint letter. Because the parties will not be able to confer and file their letter, I am also requesting the Court to adjourn the In-Person conference currently scheduled for January 10, 2020 at 2:30 p.m., until after the parties have completed their meet and confer and filed their joint letter apprising the Court of any remaining issues in dispute.<sup>1</sup>

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<sup>1</sup> For the convenience of the Court, the parties have determined that they are all available to appear for an In-person conference at any time on January 16<sup>th</sup>, 17<sup>th</sup> or 24<sup>th</sup>.

It is for these foregoing reasons, defendants respectfully request the Court to adjourn the deadline for the parties to meet and confer and file a joint letter from January 8, 2020 until January 15, 2020 and to adjourn the January 10, 2020, In-person conference to a later date convenient with the Court.

Respectfully submitted,

/s/

Joseph Zangrilli  
*Senior Counsel*

cc: BY ECF  
All counsel of record

Defendants' Letter-Motion for an extension of time (ECF No. 132) is GRANTED. The parties are directed to meet and confer and file a joint letter with the Court stating any remaining issues still in dispute by **Wednesday, January 15, 2020**. The In-Person Conference scheduled for Friday, January 10, 2020 is adjourned to **Friday, January 17, 2020 at 10:30 am** in Courtroom 18A, 500 Pearl Street, New York, New York. The Clerk of Court is respectfully directed to close ECF No. 132.

SO-ORDERED 1/9/2020

  
SARAH L. CAVE  
United States Magistrate Judge